

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS LIABILITY )  
LITIGATION )  
\_\_\_\_\_ )

MDL No. 2419  
Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO: )

All Suits )  
)

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**Notice of Stipulation on Extension of Time for  
STOPNC Defendants to Respond to  
*PSC's Supplemental Brief regarding Michael O'Neal [Dkt. 2609]*  
and  
*Motion in Limine regarding Michael O'Neal [Dkt. 2608, 2609]***

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Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John W. Culclasure, MD; Debra V. Schamberg, RN, CNOR; and Vaughan Allen, MD (collectively "the STOPNC Defendants") hereby give notice to this honorable Court and all parties:

1. Consistent with MDL Order 11 [Dkt. 1524], the STOPNC Defendants and the Plaintiffs' Steering Committee (two of the "Impacted Parties" with regard to this motion) have agreed that the STOPNC Defendants shall have through February 18, 2016, to file a written response to (1) the PSC's Supplemental Brief regarding Michael O'Neal [Dkt. 2609] and (2) Motion *in Limine* regarding Michael O'Neal [Dkt. 2608, 2609].

2. The parties are presently meeting and conferring and working on a stipulation to resolve the issues in these motions.

3. This is the first extension for response to this motion.

Respectfully submitted,

**GIDEON, COOPER & ESSARY, PLC**

/s/ Chris J. Tardio

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Defendants***

\* Admitted pursuant to MDL Order No. 1.

\*\* Admitted *pro hac vice*.

### **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing and copies will be e-mailed or mailed via regular U.S. mail to those participants identified as unregistered this 5<sup>th</sup> day of February, 2016.

/s/ Chris J. Tardio

**Chris J. Tardio**